

FILED
IN CLERKS OFFICE

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

2021 MAY 18 AM 11:35

DR. SHIVA AYYADURAI,
Plaintiff,

v.

WILLIAM FRANCIS GALVIN,
MICHELLE K. TASSINARI,
DEBRA O'MALLEY,
AMY COHEN,
NATIONAL ASSOCIATION OF STATE
ELECTION DIRECTORS,
all in their individual capacities, and
WILLIAM FRANCIS GALVIN, in his
official capacity as the Secretary
of the Commonwealth of
Massachusetts,
Defendants.

U.S. DISTRICT COURT
DISTRICT OF MASS.

MOTION FOR LEAVE TO PARTICIPATE IN THIS CASE AS *AMICUS CURIAE*

Pursuant to Local Rule 7.1, John Adams ("*Amicus*"), acting *pro se*, respectfully moves for leave to participate in this case as *amicus curiae*. *Amicus* has not consulted with any party regarding this motion because he is not an attorney admitted to practice law. As grounds for this Motion, *Amicus* states as follows:

1. *Amicus* has alleged in one or more affidavits that he was a victim of "shadow-banning" in the United States District Court for the Western District of Texas (USA, et al., v. IRS, et al., Case No. 20-cv-000362 (W.D.T.X.), by Twitter, Inc. and/or Facebook, Inc. in connection with the election of November 3, 2020.

2. *Amicus* has extensive technological experience, including web programming, mobile app development, and information technology consulting.

3. *Amicus* has extensive litigation experience and possesses formal legal education having dropped out of Boston College Law School approximately two months prior to obtaining a Juris Doctor degree in or around March 2018.

4. On May 17, 2021, *Amicus* filed papers renewing his civil action in USA, et al., v. IRS, et al., Case No. 20-cv-000362 (W.D.T.X.) and notified the United States District Court for the Western District of Texas of his intention to file an amended and/or supplemental complaint regarding alleged unlawful activity of Twitter, Inc. and Facebook, Inc. in connection with the election of November 3, 2020 and “shadow-banning” of *Amicus*.

5. In or about December 2020, *Amicus* sent the defendant, WILLIAM FRANCIS GALVIN, as Secretary of the Commonwealth, a notice to preserve information in connection with potential fraud concerning one or more computer systems during the election of November 3, 2020 in the Commonwealth of Massachusetts.

6. This Court and Plaintiff would benefit from the legal experience and training as well as the technological knowledge of *Amicus*.

7. As a consequence of the foregoing, *Amicus* has a significant interest in the disposition of the above-captioned action.

WHEREFORE, *Amicus* respectfully moves this Court for leave to participate in the above-captioned action as *amicus curiae*.

RESPECTFULLY SUBMITTED,



JOHN ADAMS

Pro Se

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DATED: May 17, 2021

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing document on the following by
United States Postal Service First Class Mail:

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Dated: May 17, 2021



JOHN ADAMS